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UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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NAVAJO NATION HUMAN RIGHTS COMMISSION; PEGGY PHILLIPS; MARK MARYBOY; WILFRED JONES; TERRY WHITEHAT; WILLIE SKOW; and MABEL SKOW,	:	
Plaintiffs,	:	<b>JOINT MOTION TO APPROVE REVISED SETTLEMENT AGREEMENT</b>
v.	:	Case No. 2:16-cv-00154 JNP
SAN JUAN COUNTY; JOHN DAVID NIELSON, in his official capacity as San Juan County Clerk; and PHIL LYMAN, BRUCE ADAMS, and REBECCA BENALLY, in their official capacities as San Juan County Commissioners,	:	Judge Jill N. Parrish
Defendants.	:	

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By and through their respective counsel, Plaintiffs, which no longer include Ms. Betty Billie Farley who has passed away, and Defendants hereby move this Court to extend the *Stipulated Settlement Agreement* and approve the *Revised Settlement Agreement*:

1. Plaintiffs and Defendants entered into a *Stipulated Settlement Agreement* on February 20, 2018, which was incorporated in a *Joint Stipulated Settlement Agreement and Motion to Dismiss* (Dkt. 198), the terms of which were incorporated into the Court's *Order re: Stipulated Settlement and Motion to Dismiss* (Dkt. 199) (hereinafter referred to as the "*Order*").
2. Under Section F, Paragraph 14 of the *Stipulated Settlement Agreement*, the parties agreed that:

[t]he procedures and services detailed [in the Settlement Agreement] shall be in place through at least the 2020 general election, at which time the parties agree to

meet, in good faith, through designated representatives within 60 days to review data collected and to determine if procedures should be altered or services reduced, increased, or held the same.

3. On December 28, 2020, the Court granted the parties' *Stipulated Modification to Settlement Agreement*, and extended the deadline set forth in Section F, Paragraph 14 to March 3, 2021.

4. On March 1, 2021, the Court granted the parties' second *Stipulated Modification to Settlement Agreement*, and extended the deadline set forth in Section F, Paragraph 14 to April 2, 2021.

5. After reviewing the data and meeting and conferring in good faith, Plaintiffs and Defendants have agreed to revise the terms of the *Stipulated Settlement Agreement* and continue the terms of the *Revised Settlement Agreement* through the 2024 election. The *Revised Settlement Agreement* is attached as **Exhibit A**.

WHEREFORE, the undersigned counsel hereby jointly move the Court to approve the modified terms in the *Revised Settlement Agreement*, including continuing the *Revised Settlement Agreement* through the 2024 election; incorporate the terms of the *Revised Settlement Agreement* into its original *Order*; and retain jurisdiction over this matter in order to enforce the terms of the *Revised Settlement Agreement*.

Dated this 2nd day of April, 2021.

**AMERICAN CIVIL LIBERTIES  
UNION OF UTAH**

/s/ John Mejia

John Mejia  
Attorney for Plaintiffs

**SUITTER AXLAND, PLLC**

/s/ Carl F. Huefner  
Carl F. Huefner  
Jesse C. Trentadue

**SAN JUAN COUNTY  
ATTORNEY**

/s/ Kendall Laws  
Kendall Laws

*Attorneys for Defendants*